

1 JULIA E. ROMANO (CA SBN 260857)

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8 Attorneys for Defendant

9 THE HOME DEPOT, INC.

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

12 CHRISTOPHER BARULICH,
13 individually and on behalf of all others
14 similarly situated,

15 Plaintiff,

16 v.

17 THE HOME DEPOT, INC., a
18 Delaware corporation, and GOOGLE
19 LLC, a Delaware limited liability
20 company,

21 Defendants.

Case No. 2:24-cv-01253

**DECLARATION OF JULIA E. ROMANO
IN SUPPORT OF JOINT STIPULATION
TO EXTEND TIME TO RESPOND TO
INITIAL COMPLAINT BY MORE THAN
30 DAYS (L.R. 8.3)**

Complaint Served: Feb. 23, 2024
Current Deadline: March 14, 2024
New Response Date: May 13, 2024

1 I, Julia E. Romano, declare as follows:

2 1. I am an attorney at the law firm of King & Spalding LLP and an attorney
3 of record for The Home Depot, Inc. (“Home Depot”) in the above-captioned matter.
4 I am licensed to practice law in the state of California and am admitted to practice
5 before this Court. I submit this declaration in support of the Joint Stipulation to
6 Extend Time to Respond to the Initial Complaint By More Than 30 Days (L.R. 8.3)
7 (“Stipulation”) in compliance with this Court’s standing order, and make this
8 declaration based on my personal knowledge.

9 2. On February 14, 2024, Plaintiff filed a class action complaint
10 (“Complaint”) in this action against Google, LLC (“Google”) and Home Depot. ECF
11 No. 1. Home Depot was served with the summons on February 22, 2024. ECF No.
12 16.

13 3. Home Depot recently retained King & Spalding as counsel in this action.

14 4. Soon after being retained, King & Spalding reached out to counsel for
15 Plaintiff to request a 60-day extension, to which they agreed. Counsel for Google
16 then drafted the Joint Stipulation, which I reviewed and approved on behalf of Home
17 Depot.

18 5. The requested extension is necessary so that Home Depot and its
19 counsel can fully assess the claims and defenses at issue, continue investigating the
20 facts surrounding Plaintiff’s allegations, identify the governing contractual
21 agreements, and locate any records of Plaintiff’s alleged calls to Home Depot. The
22 requested extension would also provide defendants time to explore consolidation of
23 this case with *Ambriz v. Google LLC*, No. 23-cv-05437, which was filed in the
24 Northern District of California on October 23, 2023, and is currently pending before
25 the Honorable Rita F. Lin. The requested 60-day extension is for same the amount of
26 time Home Depot would have had to respond to the Complaint had Plaintiff sought
27 a waiver of service (which Home Depot would have agreed to).

1 6. Upon being served, Home Depot diligently began its factual
2 investigation, assessment of the claims, and coordination with Google. However,
3 Home Depot cannot complete these steps by March 14, the current deadline to
4 respond to the Complaint. The 60-day extension is designed to allow sufficient time
5 to complete these steps.

6 7. No previous extensions by either party have been sought in this case.
7

8 I declare under penalty of perjury of the United States of America that the
9 foregoing is true and correct.
10

11 Dated: March 11, 2024

KING & SPALDING LLP

12
13 By: /s/ Julia E. Romano

14 Julia E. Romano
15 Attorneys for Defendant
16 THE HOME DEPOT, INC.
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